

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 95 CR 508-1
v.)	
)	Judge Harry D. Leinenweber
LARRY HOOVER,)	
a/k/a "The Chairman," "The King")	

**GOVERNMENT'S SUPPLEMENTAL RESPONSE TO LARRY HOOVER'S
MOTION FOR RELIEF UNDER THE FIRST STEP ACT**

The United States of America, through its attorney, John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, respectfully supplements its prior response to Larry Hoover's motion for relief under the First Step Act as follows:

1. On July 16, 2020, the parties presented oral argument on whether the Court should exercise discretion to reduce Hoover's sentence, assuming Hoover is even eligible to seek relief under the First Step Act. In assessing whether Hoover still poses a danger to the community, the Court questioned whether "the gang structure in Chicago is vastly different today than it was 25 years ago. Gangs seem to be smaller, but not necessarily less vicious, but smaller in number." Tr. 5-6.

2. Although 25 years have passed since Hoover was indicted in this case, the Gangster Disciples are still active and Hoover remains a revered and inspirational figure within the gang. Just last month, a federal grand jury in the Southern District of Illinois returned an indictment charging several alleged Gangster Disciple leaders with racketeering conspiracy, murder in aid of

racketeering, and related offenses. *See United States v. Smith et al.*, No. 21 CR 30003 (S.D. Ill.). The indictment in that case—attached hereto as Exhibit A—contains several allegations that are pertinent to Hoover’s ongoing notoriety and power among Gangster Disciples. As alleged in the indictment, the grand jury found probable cause to believe:

a. “The Gangster Disciples is a street and prison gang that began in or about the 1960s. Originally the gang engaged primarily in large-scale drug trafficking and violence in and around Chicago, Illinois. In the decades since its founding, the gang has spread throughout the United States and expanded the scope of its criminal activities.” Count 1 at ¶ 1.

b. “‘Chairman’ is the title reserved for Gangster Disciples founder Larry Hoover, who is also known by titles of respect such as ‘Chief,’ ‘Dad,’ and the ‘Old Man.’” Count 1 at ¶ 3.a.

c. “The Gangster Disciples hold gatherings and celebrations on certain dates of importance to the organization, such as the birthday of founder Larry Hoover.” *Id.*, Count 1 at ¶ 8; *see also id.* Overt Acts at ¶ 13 (“On or about November 25, 2017, [defendant Frank Smith] and other Gangster Disciples leaders held an event in Chicago, Illinois, celebrating the birthday of Gangster Disciples founder and ‘Chairman’ Larry Hoover.”).

d. “The Gangster Disciples are highly active within state and federal prison systems...Gangster Disciples members in prison often communicate with those outside for the purpose of coordinating criminal activity, including violence

against rival inmates and the smuggling of drugs and other contraband into correctional facilities.” Count 1 at ¶ 9.

e. “On or about September 1, 2014, [defendant Anthony] Dobbins informed [defendant Warren] Griffin that Larry Hoover had appointed both Dobbins and Griffin as Board Members.” Count 1, Overt Acts, ¶ 2.

f. “On or about October 11, 2014 Dobbins and Griffin discussed challenges to their authority from subordinate Gangster Disciples members, with Dobbins indicating that a particular member should be dealt with violently if he continued to resist.” Count 1, Overt Acts, ¶ 3.

g. “On or about December 6, 2014, Dobbins and Griffin discussed gang business including Griffin’s intention to kill Mitchell Coleman, a Gangster Disciples member in East St. Louis, Illinois, if Coleman continued to resist Griffin’s authority.” Count 1, Overt Acts, ¶ 5; *see also id.* at ¶¶ 6-7 (additional discussions between Griffin and Dobbins about killing Coleman).

h. “On or about March 26, 2016, Griffin and Dobbins endorsed the recent murders of four Gangster Disciples members, which resulted from the victims’ opposition to Griffin’s and Dobbins’s leadership in East St. Louis, Illinois.” Count 1, Overt Acts, ¶ 8.

i. “On or about May 18, 2018, Griffin and Dobbins shot and killed Ernest Wilson, also known as ‘Don Smokey,’ a rival Gangster Disciples Board Member, in Chicago, Illinois.” Count 1, Overt Acts, ¶ 23; *see also id.* at Counts 11-13

(murder in aid of racketeering, § 924(c), and § 924 (j) charges against Griffin and Dobbins relating to the Ernest Wilson murder).

3. The connection between Hoover and Dobbins is not limited to the grand jury's finding of probable cause to believe that in September 2014, Dobbins told Griffin that Hoover had appointed them to the Gangster Disciples board of directors. Count 1, Overt Acts, ¶ 2. Following a disciplinary hearing at which Hoover had the right to make a statement and present evidence, the Bureau of Prisons found that in June 2015, Hoover engaged in unauthorized communication with Dobbins (a fellow inmate at ADX Florence) via coded messaging. As detailed in the incident report attached hereto as Exhibit B—which was filed previously (Dkt. 1258-2 at 21-28), but with redactions that have now been removed—Dobbins wrote a coded message to Hoover that read:

Chief, this code is very important. We both have to be absolute about this interpret [sic] system. Whenever we see a word with a small dash in front, we do not count that word. We only count the whole word that is the farthest over to the left. We also count every single letter. Only we know this code. Nobody else does. We communicate in plain sight. I am ready to handle your business.

Exhibit B at 4. In their respective cells, both Hoover and Dobbins had copies of the same dictionary that was required to interpret that coded message. *Id.* at 1. Indeed, the dictionary in Hoover's possession had Dobbins's name on the inside cover. *Id.*

4. The new indictment against Dobbins and other gang leaders shows, at a minimum, that Hoover remains an inspirational figure within the Gangster Disciples and is still regarded as the Chairman. Dobbins's claim that Hoover appointed him to the gang's board of directors—and Dobbins's attempt to send a

coded message to Hoover, offering to handle his business—further illustrate Hoover’s ongoing stature and power.

5. Against that backdrop, granting Hoover a discretionary reduction in his sentence would send a shockwave through the community and embolden gang members who still look to Hoover as their inspirational leader. Life imprisonment remains the only appropriate sentence for Hoover to reflect the seriousness of his offense conduct, to promote general deterrence and respect for the rule of law, and to protect the public from further criminal activity.

Dated: February 8, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Grayson Sang Walker, hereby certify that on February 8, 2021, I electronically filed the foregoing **GOVERNMENT'S SUPPLEMENTAL RESPOSE TO DEFENDANT LARRY HOOVER'S MOTION FOR RELIEF UNDER THE FIRST STEP ACT** with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the Case Management/Electronic Case Files (CM/ECF) system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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